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D. Roman



OLD MISSION BANK

September 16, 2005

2005 OCT 3 AM 10 17

FDIC

San Francisco Regional Office
Director John F. Carter
25 Jessie Street at Ecker Square
Suite 2300
San Francisco, CA 94104

Reference: Wal-Mart ILC

Dear Director Carter,

As Senior Vice President, Chief Financial Officer and a founding incorporator of Old Mission Bank in Sault Ste. Marie, Michigan, I strongly oppose the approval of any form of banking authority for Wal-Mart. It will have far-reaching negative impacts.

Old Mission Bank is a 5-year old, \$73 million community bank that was formed with the pledge to serve our local tri-county area. We moved from operating losses to profitability in only 13 months, and have not looked back. Our community needs and seeks the involvement and commitment of local banks and their officers, directors and employees. As a community bank, we put the best interests of our customers and our community first. These people and their businesses are my neighbors, friends, and family. By taking care of their needs and helping our community grow and prosper, we benefit as a local business. Despite their advertising promises and political posturing, Wal-Mart does not have the same objectives.

Crossing the banking-commerce division is a huge step toward a dangerous change in our nation's banking system. Our country's banking system is built on fairly strict governance and controls—giving Wal-Mart any banking powers (even if it is “just” the ability to create an ILC) crosses the line. It also represents one more step in defeating the ability of small American businesses to compete and thrive in small communities. Community banks already have a difficult time competing against credit unions in this country because of the tax advantages given credit unions (as “non-profit” organizations, they pay no federal or state taxes, and are subject to less stringent safety and soundness regulatory requirements than banks are). If Wal-Mart is given this permission, we will see a Wal-Mart Bank in every community that contains a Wal-Mart store. With their multi-national access to markets and funds, Old Mission Bank's competitive position would be further weakened by introducing yet another “giant” in our market. Wal-Mart consistently enters an area with the goal of eliminating locally-owned competitors. It wants to control the markets it enters, and banking is one segment that must be kept off their balance sheet. When my previous employer, a 100-year old community bank was sold to a national chain, the resulting loss of jobs due to corporate consolidation (to recover the costs of acquisition) quickly took the luster out of what was promoted to the community as a “new and prosperous change for our area.” Their promise was just as hollow as Wal-Mart's.

Old Mission Bank has an exemplary record, both for meeting our area's needs and for safety and soundness. You can readily check our scores. In 2000, we became the first de novo

~Main Office~

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www.oldmissionbank.com

to obtain Freddie Mac Underwriting approval immediately after opening. We currently service over \$48 million in secondary market loans. Our commercial lending is second to none in our market. Our total loan portfolio now exceeds \$55 million, with a loan-to-deposit ratio of 79%. We currently have 30 employees, a main office and one branch--with a branch construction project on the horizon. Our stock is trading at \$21.00 per share providing investors with a significant return on their original \$10.00 per share investment.

Our customers' deposits have been turned into the loans that grow our businesses and build our city. Old Mission Bank has made tremendous contributions to the growth and development of the Eastern Upper Peninsula of Michigan—a great accomplishment in the 5 years since its inception. We intend to independently serve this area for many generations. I wholeheartedly doubt Wal-Mart's ability to identify this area on a map, let alone have a long-term commitment to ANY small town in this country. **Please help us and other community banks operate safely and competitively for future generations. Vote NO on granting Wal-Mart ANY banking authority. Keep the realms of commerce and banking separate—this separation was established in wisdom and has served our nation well. It must continue to do so; can only continue if you vote NO.**

Sincerely Yours,



Catherine E. Chenoweth,
Senior Vice President/CFO

CEC/mkj



OLD MISSION BANK

September 16, 2005

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San Francisco, CA 94104

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Dear Director Carter,

As the founding Vice President and Operations Officer of Old Mission Bank in Sault Ste. Marie, Michigan I strongly oppose the approval of any form of banking authority for Wal-Mart. It will have far reaching negative impacts.

Old Mission a 5 year old, \$73 million asset community bank was formed with the pledge to serve our local tri-county area, and its 300+ resident shareholders *not* the whole of Michigan. Over the course of 14 months we went from a net loss to profitability and have not looked back. Our community needs and seeks the involvement and commitment of our bank, its officers, directors and employees.

As a community bank, we put the best interests of our customers and our communities first because these are my neighbors, friends, and family and the same to all my associates. By taking care of their needs and helping our community grow and prosper, we in turn will benefit.

Wal-Mart, despite all the advertising promises and political posturing does not have the same objectives. Their top management and board of directors most likely cannot even pronounce Sault Ste. Marie correctly, let alone know the needs and cares of our community. Give them banking powers, and we will see Wal-Mart Bank in every community there is a Wal-Mart store. Because of their size and ability to deal on a national scale, Old Mission Bank would have a very difficult time competing for deposit dollars and loans if the giant decided to flex its muscle. Wal-Mart is out to control markets and banking is one segment that must be kept off their balance sheet. When our previous employer, a 100 plus year old community bank was sold to a national chain, the loss of jobs caused by consolidation to recover costs of acquisition quickly took the luster out of what was promoted as a "new and prosperous change for our area." Their promise was hollow—so is Wal-Mart's.

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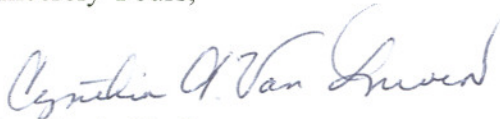
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(D. P. Roman)

Our customer's deposits become the loans that build our city and towns. I truly believe that Old Mission Bank has made tremendous contributions to the overall growth and development of the Eastern Upper Peninsula of Michigan since its inception. We intend on serving the generations that follow.

Help us and other community banks across our great nation be there for future generations. Vote NO on Wal-Mart banking authority. Keep the realm of Retail and Banking separate—it has served our nation well in the past and will continue to do so. To sacrifice Community Banking for a retail giant's desires makes no sense at all.

Sincerely Yours,

A handwritten signature in blue ink that reads "Cynthia A. VanLuven". The signature is fluid and cursive, with the first name "Cynthia" and last name "VanLuven" clearly legible.

Cynthia A. VanLuven,
Vice President/Operations Officer

CAV/mkj



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San Francisco, CA 94104

Reference: Wal-Mart ILC

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Sincerely Yours,



Steven Glezen,
Vice President/Security Officer

SG/mkj



OLD MISSION BANK

September 16, 2005

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San Francisco Regional Office
Director John F. Carter
25 Jessie Street at Ecker Square
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San Francisco, CA 94104

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Dear Director Carter,

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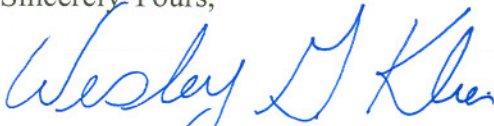
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(D. P. Romani)

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Sincerely Yours,

A handwritten signature in blue ink, reading "Wesley G. Klier". The signature is fluid and cursive, with the first name "Wesley" being more prominent and the last name "Klier" following in a similar style.

Wesley G. Klier,
Assistant Vice President/Loan Servicing Manager

WGK/mkj